

LO Exhibit A-15

ZOOM DEPOSITION OF LAURIE A. ORTOLANO

Zoom deposition taken, by agreement of counsel,
on Tuesday, July 29, 2020, commencing at 1:00 P.M.

Court Reporter: (Via Zoom)
Tina L. Hayes, LCR, RPR
NH Licensed Court Reporter No. 80
(RSA 310-A:161-181)

1 Q. And when you read this the other day, you
2 didn't notice that?

3 A. Didn't mark it. I noticed it and didn't
4 highlight it.

5 Q. And, apparently, you didn't remember it
6 when I have now asked you twice about anything that
7 needs to be corrected?

8 A. I actually spoke to my lawyer Monday about
9 it but forgot.

10 Q. Thirteen different taxpayers had their
11 values reduced by a total of 24 million. Were some
12 of those properties exempt from taxation anyway?

13 A. Yes.

14 Q. Most of them; right?

15 A. Yes.

16 Q. Has any City official ever called you a
17 derogatory name?

18 A. Not that I can recall. I mean -- no.

19 Q. Have you called any City official or
20 employee by a derogatory name?

21 A. Yes.

22 Q. How many?

23 A. How many City officials?

1 Q. Yes.

2 A. I don't know what you define as a
3 derogatory name. I was thinking of one incident in
4 a private phone conversation. But I don't know what
5 you consider derogatory; so that's a tough thing for
6 me to answer.

7 Q. Well, tell me about the phone call. Who
8 were you talking to?

9 A. Ms. Kleiner.

10 Q. And what did you call her?

11 A. I didn't call her a personal name. I told
12 her that she was a malevolent person, that her
13 actions were.

14 Q. Have you ever called any City official
15 stupid?

16 A. Not that I know of.

17 Q. Do you recall, after a board of assessors
18 meeting, when the equalization ratio for 2018 came
19 down from the Department of Revenue Administration?

20 A. Yes.

21 Q. And I had told the board of assessors that
22 I was going to look into the possibility of mounting
23 a challenge and appealing that figure. Do you

1 recall that meeting?

2 A. Yes.

3 Q. And do you recall you approached me after
4 the meeting?

5 A. No. You approached me.

6 Q. Do you recall what you said to me?

7 A. I recall you being angry and saying that
8 you didn't like me challenging you. And I recall,
9 as you walked out of the room, I called you a loser
10 as you were leaving the door. I said, "Steve, you
11 are a loser." That's what I recall.

12 Q. Do you recall using the word "ridiculous"?

13 A. Probably, but I don't remember.

14 Q. And you don't recall calling me stupid?

15 A. No. I called you a loser, I remember. I
16 wonder if you thought that was stupid, but I
17 definitely called you that.

18 Q. Have I ever treated you other than with
19 respect?

20 A. You have treated me with disrespect at
21 times.

22 Q. What times?

23 A. That specific incident. You came up and

1 barked very closely in my face. I could feel you
2 right against me, and you were angry. And it ensued
3 with me responding in an angry fashion as well.
4 That was an emotional moment for both of us.

5 Q. Has any of -- has any City official or
6 employee ever addressed you using vulgar and profane
7 words and phrases?

8 A. No, not that I can recall.

9 Q. Have you used vulgar words and phrases in
10 addressing any City official or employee?

11 A. I had a few private phone calls I can
12 think of to Alderman Tencza and another alderman
13 where I expressed my dissatisfaction with how the
14 City was handling the situation. And in a private
15 phone call, I swore. I did do that.

16 Q. Do you recognize the room I am sitting in?

17 A. Yes.

18 Q. You have been in this room?

19 A. Yes, for our mediation.

20 Q. Other occasions?

21 A. We had -- you and I had a meeting in here.
22 That -- I don't believe that was the room that we
23 met with Ms. Kleiner, you and I, was it? I don't

1 recall.

2 Q. I think it is.

3 A. Okay.

4 Q. Do you remember that meeting with
5 Ms. Kleiner and I?

6 A. Yes.

7 Q. Do you remember getting angry?

8 A. Yes.

9 Q. Do you remember standing up from your
10 chair, pacing around the room, and ranting at us?

11 A. No. I feel that's very --

12 Q. Do you remember you used vulgar terms?

13 A. I was very direct. It had been when the
14 police report had -- my private investigation report
15 had just come out. It was the meeting where
16 Ms. Kleiner was so disrespectful to my data and
17 didn't even look at it. It was a meeting to go over
18 sales data, where I brought the three copies in to
19 share and discuss it. And she sat in front of her
20 with a list and said -- put her hands down -- "I
21 have already got all this. I have all this
22 information."

23 And you are right.

1 (Simultaneous crosstalk.)

2 (Reporter admonition.)

3 MR. LEHMANN: Let her finish her answer.

4 A. She smacked her hands down and said, "I
5 have already got all of this, Laurie. I know" -- "I
6 have already checked all this data."

7 And then you said to me, "Well,
8 Mrs. Ortolano, what do you see and what problems do
9 you see?"

10 And I slid you a spreadsheet, and we
11 opened it up. And I said, "Here are some properties
12 specifically that I think are wrong."

13 And you said, "Those are too low. I
14 understand what you are saying."

15 And I was infuriated with Ms. Kleiner at
16 that meeting. I called a meeting to meet with her
17 to go over sales data, and she agreed to have the
18 meeting. And she was disrespectful and
19 disinterested; I wondered why I was there, why I
20 even bothered.

21 And the secondary issue of the report
22 being released, the meeting was set up before I knew
23 the Freyler report was coming out. And the Freyler

1 report had come out the day before. So we
2 subsequently got into a discussion about the Freyler
3 report. And I can tell you I was disgusted with
4 what that report produced.

5 So you are accurate to say I was angry.
6 If you say I swore or used vulgar language in that
7 exchange between the three of us, it's possible. I
8 won't deny that. I know I was angry. I was
9 thoroughly disgusted with the City at that point.
10 But if you press me for the exact language, I simply
11 won't remember. I will take responsibility for what
12 it was.

13 Q (By Mr. Bolton) Does it surprise you that
14 people are reluctant to deal with someone who treats
15 others in that way?

16 A. Yes, it does surprise me.

17 Q. So it's your position that people should
18 continue to go out of their way to be helpful to
19 you, even though, if you don't get everything you
20 want, you call people names and use vulgar language?

21 MR. LEHMANN: I object to the form of the
22 question.

23 Answer to the best of your ability.

1 A. I am not going answer to that. I object
2 to the question too.

3 I have had my name put in the newspaper by
4 the City. I have had Ms. Kleiner stand at a
5 microphone and describe my husband and I in pretty
6 unflattering terms. I have had assessors not
7 respond to my questions and walk away, leaving me
8 hanging. Should I feel that I have been treated
9 well? This cuts both ways.

10 Q (By Mr. Bolton) You have never heard me
11 use vulgar language towards you, have you?

12 A. No.

13 MR. BOLTON: That's all I have.

14 MR. LEHMANN: Okay. I just have a couple
15 of quick questions, Laurie.

EXAMINATION

17 BY MR. LEHMANN:

18 Q. During this deposition, you were asked a
19 number of questions about how you know things that
20 are alleged in the complaint; right?

21 A. Yes.

22 Q. And you were asked a number of questions
23 about who in the city took specific kinds of actions

1 that are set forth in the complaint; right?

2 A. Yes.

3 Q. And you have been asked to identify
4 specific facts that make you believe other facts to
5 be true; right?

6 A. Correct.

7 Q. Have you reviewed a letter from Attorney
8 Leonard asserting that the City would be producing
9 it's Rule 22 disclosures by July 24?

10 A. It was in my calendar. Yes.

11 Q. Are you aware of whether or not those have
12 been produced at this point?

13 A. I have not seen them.

14 Q. So in answering the questions that you
15 were asked today, have you had an opportunity to
16 review the evidence that's in possession of the City
17 of Nashua that might answer some of those questions?

18 A. No, I have not.

19 MR. LEHMANN: That's all I have.

20 MR. BOLTON: Nothing further.

21 (The deposition concluded at 4:10 P.M.)

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